

Policy Title	Confidentiality in CSLC
Policy Number:	ADM 8.03
Department:	SOMI
Functional Area:	Clinical Simulation & Learning
Contributing Department	
Approved by:	RHEI Leadership Team
Effective Date:	8/1/2023
Version:	1
Status:	Approved
Manual	To be entered by Compliance360 System administrators or N/A if not in C360
Section	ADM 8

I. Mission, Vision and Values

This policy reflects our commitment to human dignity, integrity, compassion, stewardship, and service by guiding decisions and actions that uphold respect for all individuals and promote excellence in our work.

This policy aligns with our mission of extending the compassionate ministry of Jesus by improving the health and well-being of our communities and providing good help to those in need, especially the poor, dying, and underserved by ensuring that our practices support ethical, effective, and accountable service across all areas of the organization.

II. Policy

Confidentiality in CSLC

III. Purpose

All students, whether in a Richmond Higher Education Institute (RHEI) program or health system workforce members who are participating in a simulation, will keep as confidential information pertaining to the content of the simulations, student performance, and students attending education simulations at the Clinical Simulation & Learning Center (CSLC). Doing so is essential to enabling each participant to participate fully in CSLC activities and achieve the learning objectives. Authorization will be obtained from students prior to the release of any simulation photographs or audio/visual recordings in which they appear when used for purposes other than to validate clinical competency for educational purposes.

IV. Scope

All participants in simulation-based learning in the CSLC

V. Policy Details

RHEI Students

Each student is oriented to the CSLC. During this orientation, students are given a copy of: 1) the Clinical Simulation & Learning Center Laboratory Guidelines, which include safe practices; 2) the Participation in Simulation Confidentiality Statement, which is a mandatory document that all students must sign prior to participation in simulation activities; and 3) the Participation in Simulation Authorization to Release Photographs and Audio/Visual Recordings, which is an optional document that students may voluntarily sign to authorize release of simulation photographs or audio/visual recordings for purposes other than to validate clinical competency. Students will be required to sign the CSLC Laboratory Guidelines and the Participation in Simulation Confidentiality Statement and given the option to sign the Participation in Simulation Authorization to Release Photographs and Audio/Visual Recordings. Failure to sign the CSLC Laboratory Guidelines or the Participation in Simulation Confidentiality Statement will result in the student's inability to participate in the simulation activities which may negatively impact the student's participation in the program. A copy of the signed forms will be maintained with the student's official record for RHEI students, and on file at the CSLC for a period of three years for non-RHEI student participants.

When photographs or audio/visual recordings are made to validate clinical competency, they are expected to be used for educational purposes only, and in all instances, they will be used consistent with the Family Educational Rights and Privacy Act (FERPA). The photographs or audio/visual recordings are to be reviewed only by the student, faculty, unit educator, unit supervisor/manager, and simulation staff, as appropriate. Such photographs or audio/visual recordings will be deleted after all parties have completed their review or thirty (30) days from the end of the semester in which the simulation occurred

When photographs or audio/visual recordings are made for purposes other than to validate clinical competency (for example, to be published and reproduced in professional journals and medical books; to be used at professional meetings; and to be used for any other purpose for which Richmond Higher Education Institute or its staff members may deem fit in the interest of medical education or research), consent must be obtained from those photographed or recorded. Prior to the taking or release of any such photographs or audio/visual recordings, staff must confirm that the student has signed the Participation in Simulation Confidentiality Statement and Participation in Simulation Authorization to Release Photographs and Audio/Visual Recordings.

Health System Personnel or Outside Entities

Each non-student participant is given a copy of consent and waiver specific to the event on the day of the event. Participants will be asked to sign the consent and waiver. Signed copies of the consent and waiver will be maintained on file at the CSLC for a period of three years.

Reference documents

- Clinical Simulation & Learning Center Laboratory Guidelines
- Participation in Simulation Confidentiality Statement
- Event specific Consent and Waiver

Definitions

None

VI. Attachments

N/A

VII. Related Policies and Procedures

None

VIII. Regulatory Notices

Nothing in this policy creates a contractual relationship between Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI), a department owned and controlled by Bon Secours St. Mary's Hospital of Richmond, LLC, and any party. SOMI, in its sole discretion, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

IX. Version Control

Version	Effective Date	Next Review Date	Description	Supersedes, if applicable	Prepared By
1.0	8/1/2015	N/A	Revisions and new template	N/A	Dean, CSCL
2.0	5/25/2022	N/A	Reviewed, changed video destroy date.	1.0	Dean, CSCL
3.0	6/2/2023	6/2/2026	Review and recommendation by legal	2.0	Dean, CSCL
1	6/2/2023	6/2/2027	Version Changed – BSMH Template Adopted	2.0	Dean, CSCL

This policy/procedure/guideline is not intended to establish a standard of clinical or non-clinical care or practice. Rather, this policy/procedure/guideline creates a general tool to help guide decision-making with the understanding that different action(s) may be necessary in response to the totality of the circumstances presented.

Sites revised 05/06/2025- Bon Secours Mercy Health adopts the above policy, procedure, policy & procedure, guideline, manual / reference guide / instructions, or principle / standard / guidance document for all Bon Secours Mercy Health entities including, but not limited to, facilities doing business as Mercy Health – St. Vincent Medical Center, St. Vincent – St. Charles Hospital, St. Vincent – St. Anne Hospital, Mercy Health – Perrysburg Medical Center, Mercy Health – Tiffin Hospital, Mercy Health – Willard Hospital, Mercy Health – Defiance Hospital, Mercy Health Allen Hospital LLC, Mercy Health - Lorain Hospital, Mercy Health St. Elizabeth Youngstown Hospital, Mercy Health St. Joseph Warren Hospital, Mercy Health - St. Elizabeth Boardman Hospital, Mercy Health - St. Rita's Medical Center, Mercy Health

– Springfield Regional Medical Center, Mercy Health - Urbana Hospital, Mercy Health - Anderson Hospital, Mercy Health - Clermont Hospital, Mercy Health – Fairfield Hospital, Mercy Health - West Hospital, The Jewish Hospital – Mercy Health, Mercy Health – Kings Mills Hospital, LLC, Mercy Health - Lourdes Hospital LLC, Mercy Health – Marcum and Wallace Hospital, Chesapeake Hospital Corporation DBA Rappahannock General, Maryview Hospital, Bon Secours Richmond Community, Bon Secours Memorial Regional Medical Center, Bon Secours – St. Mary's Hospital, Bon Secours St. Francis Health System, Bon Secours St. Francis Medical Center, Bon Secours Mary Immaculate Hospital, Bon Secours - Southside Medical Center, Bon Secours Mercy Health Franklin, LLC, Southern Virginia Medical Center, and Bon Secours Harbour View Medical Center. This also may apply to Bon Secours Mercy Health Medical Group LLC and its medical group affiliates.